

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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IN RE: Family Dollar Stores, Inc., )  
Pest Infestation Litigation )  
 ) 2:22-md-03032-SHL-tmp  
 ) (MDL Docket No. 3032)  
This Document Relates to )  
 )  
ALL CASES )  
 )

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**PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL**

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Plaintiffs Dondrea Brown, Muriel Vanessa Brown, Vinnie L. Smith, Julian A. Graves, Reginald and Sonya Fields, Taylor Lorimer, Martha “Keisha” Lacy, Sheena Bibbs, Jerome Whitney, Tina Bishop, Sonya Mull, and Christine Robinson (collectively referred to as, “Plaintiffs”), individually and on behalf of all others similarly situated, by and through undersigned counsel submit this Motion For Leave to File Under Seal the Amended Complaint.

In the Amended Complaint, Plaintiffs include information designated as confidential by Defendants as well as third parties. For example, the Amended Complaint includes an unredacted Food and Drug Administration (“FDA”) report, certain Ecolab documents, and inspection photos marked confidential.

Plaintiffs respectfully request that the Court grant them leave to file their Amended Complaint under seal to protect information designated as Confidential pursuant to the Protective Order [Dkt. No. 58] and permit Plaintiffs to file a redacted version of the Amended Complaint.

Defendants consent to the provisional filing under seal of the Amended Complaint. Consistent with the Local Rules, Defendants will review the Amended Complaint

once they receive a copy and identify specific redactions and sealing requests for the Court at their earliest convenience. The parties will confer to narrow any disputed areas in advance of this filing.

Dated: October 17, 2022.

Respectfully submitted,

/s/ Gerard Stranch, IV

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*Plaintiffs' Steering Committee*

**CERTIFICATE OF SERVICE**

I, J. Gerard Stranch, IV, hereby certify that the foregoing Plaintiffs' Motion for Leave to File Under Seal was served on October 17, 2022, via e-mail and the Court's ECF system to the following:

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